

REMARKS

I. Introduction

In a September 16, 2004, Office Action (herein "Office Action"), Claims 1-3, 6-8, and 16-18 were rejected under the judicially created doctrine of double patenting over Claims 1-3 and 6-8 of U.S. Patent No. 6,698,021 ("the '021 Patent"). Additionally, Claims 1-3, 6-8, and 16-18 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,226,031 to Barraclough et al. ("Barraclough"). Claims 1-58 are canceled. Claims 59-101 are added in this response and pending in the present application.

II. Double Patenting

Claims 1-3, 6-8, and 16-18 were rejected under the judicially created doctrine of double patenting over Claims 1-3 and 6-8 of the '021 Patent. The '021 Patent and the present application are commonly owned, include the same disclosure, and were filed on the same date.

Because new Claims 59-101 are similar to the issued claims of the '021 Patent, applicants submit the enclosed terminal disclaimer to overcome any potential double patenting rejection with respect to the new claims. Accordingly, withdrawal of the rejection is requested.

III. New Claims 59-101

As discussed during a March 9, 2005 telephone conference, Claims 1-58 are being canceled and new Claims 59-101 are being added. Claims 59-101 are similar to Claims 1-16 and 43-53 of the '021 Patent. In particular, Claims 59-74 are similar to issued Claims 1-16 of the '021 Patent. Claims 86-101 are also similar to issued Claims 1-16 of the '021 Patent.

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AMENDMENTS TO THE DRAWINGS

Attached are replacement drawings for FIGURES 5 and 6. The replacement FIGURE 5 changes numeral 322 to numeral 332, in accordance with the specification. The replacement FIGURE 6 changes numeral 332 to numeral 322, in accordance with the specification.

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Additionally, Claims 86-101 are drafted in means-plus-function language. Claims 75-85 are similar to Claims 43-53 of the '021 Patent.

As acknowledged in the Notice of Allowability filed in the '021 Patent, included as Attachment A, "the element of the claims related to the initialization of the cameras by the off-site centralized controller was not found nor deemed obvious by the Examiner." (September 15, 2003, Notice of Allowance, p. 2.) Applicants submit that the changes being made to the issued claims do not alter their allowability over the prior art.

IV. 35 U.S.C. § 103(a) Rejection

Claims 1-3, 6-8, and 16-18 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,226,031, to Barraclough et al. (hereinafter "Barraclough"). Those claims have been canceled and new Claims 59-101 have been added. With respect to new Claims 59-101, applicants submit that the claims are allowable over the cited art because Barraclough fails to teach or suggest a system including a centralized control site including at least one server having the claimed specific functionality related to video surveillance and video monitoring of at least two surveillance cameras at distinct monitored sites.

More specifically, applicants submit that Barraclough fails to teach or suggest a server that initializes communications between the surveillance cameras and the off-site client workstations. Additionally, Barraclough fails to teach or suggest a server that coordinates the retrieval of video images from a number of surveillance cameras at distinct monitored sites and produces live video images to off-site client workstations. Additionally, applicants submit that Barraclough fails to teach or suggest a server that enables the off-site client workstations to achieve communication with selected surveillance cameras without direct, persistent access to

the selected surveillance cameras. Prior to providing a more detailed discussion as to the patentability of the claims of the present invention, a brief discussion of the present invention and the cited art will be presented.

A. Summary of the Present Invention

The present invention is generally directed toward a video surveillance and monitoring system including three identifiable communication and processing layers, namely, a number of surveillance cameras, a centralized control site, and at least one off-site client workstation. The system includes a private network operable to enable two-way communication with one or more surveillance cameras located on-site at a plurality of distinct monitored sites. The centralized control site includes at least one server coupled to the private network and also to a public network. The server coordinates the retrieval of video images from the surveillance cameras. The server also initializes communications between the surveillance cameras and at least one off-site workstation coupled to a public network. The off-site client workstation cannot initialize communications directly with the surveillance cameras. Further, the server enables the off-site client workstations to effect communication with selected surveillance cameras.

Numerous advantages may be realized in accordance with one or more embodiments of the present invention. In one aspect, the present invention eliminates the need for each off-site client workstation to have autonomous capability for communication with each individual surveillance camera through the centralization of both image transmission and camera control activities through a control site. For example, a client workstation may access live video monitoring data from three distinct geographic sites without having to individually access, or address, each surveillance camera. In another aspect, the off-site client workstations may communicate with the centralized control site via a public network, while the security cameras

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maintain data communications within a private network. The centralized control site can maintain initialization control of communications between the workstations and the surveillance cameras. This configuration can mitigate unauthorized direct access of the surveillance cameras by the client workstations. In still a further aspect, the centralized control site allows multiple off-site client workstations to view images controlled by a single workstation. Additional advantages may also be realized in accordance with the present invention.

B. Summary of U.S. Patent No. 6,226,031 (Barraclough)

Barraclough is directed toward a video communication and monitoring system for use in monitoring a location. In particular, Barraclough describes two types of video communication and monitoring systems. First, Barraclough describes a two-layer system architecture. The two-layer system architecture includes video processing units 210a, 210b that operate at a supervisory level and other remotely-coupled video processing units 214a and 214b through 214z that operate at a subscriber level. As described, operation of such a two-layered system begins "with a call being established between a remote site and a supervisory site." (Col. 8, lines 20-23.) Additionally, control of the supervisory site is accomplished by the supervisory unit checking whether a camera-view control command has been received. (Col. 8, lines 59-65.)

Second, Barraclough describes a three-layer system architecture. The three-layer system includes video processing units 214a and 214b through 214z operating at a subscriber level, video processing units 210a, 210b operating at a supervisory level, and a server 230 intercoupled between the supervisory video processing units and the subscriber video processing units. (Col. 6, lines 49-53.) The three-layer system described in Barraclough purportedly allows a large number of remote-site video processing units to obtain images recorded by one or more

supervisory video processing units 210a, 210b. (Col. 6, lines 49-61.) In particular, Barraclough describes that by inputting commands from a remote site, "a memory 246 can be used to playback selected images that have been automatically recorded or recorded per customized commands." (Col. 7, lines 50-60.) The three-layer system of Barraclough does not teach or suggest providing actual communication between the subscription-based video processing units and the supervisory video processing units. Additionally, the three-layer system of Barraclough does not teach or suggest providing the subscription-based video processing unit's remote site with live video images from the supervisory video processing units.

Barraclough is limited to teaching a two-layer system architecture in which communication of a camera may be accomplished and a three-layer system architecture that does not provide actual communication between a camera and a remote site, and only provides recorded images. It does not teach a system having a centralized control site that initializes communications between a client workstation and a surveillance camera and that enables the off-site client workstations to effect communication with selected surveillance cameras, wherein the off-site client workstation cannot initialize communication with the surveillance cameras.

V. The Claims Distinguished

A. New Claims 59 and 86

The Office Action asserts that Barraclough teaches a video surveillance and monitoring system including at least two surveillance cameras and a centralized control site wherein the server is operative to initialize communication between the cameras and the at least one off-site client workstation. For the following reasons, applicants respectfully disagree.

In its entirety, new Claim 59 recites:

A video surveillance and monitoring system, comprising:

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a private network that enables communication with surveillance cameras corresponding to monitored sites;

wherein at least two surveillance cameras correspond to distinct monitored sites; and

a centralized control site, including at least one server, said at least one server being coupled to said private network and to a public network, said at least one server being operative to initialize communications between the surveillance cameras and at least one off-site client workstation coupled to said public network, to coordinate the retrieval of video images from all said surveillance cameras, to produce said retrieved video images as live images to the at least one off-site client workstation, and to enable off-site client workstations to effect communication with selected surveillance cameras, wherein the off-site client workstation cannot initialize communication with the surveillance cameras.

In a similar manner, new Claim 86 recites in its entirety:

A video surveillance and monitoring system, comprising:

a private network means for enabling communication with surveillance cameras corresponding to monitored sites; wherein at least two surveillance cameras correspond to distinct monitored sites; and

a centralized control site means, including at least one server means, said at least one server means being coupled to said private network and to a public network, said at least one server means being operative to initialize communications between the surveillance cameras and at least one off-site client workstation coupled to said public network, to coordinate the retrieval of video images from all said surveillance cameras, to produce said retrieved video images as live images to the at least one off-site client workstation, and to enable off-site client workstations to effect communication with selected surveillance cameras, wherein the off-site client workstation cannot initialize communication with the surveillance cameras.

The present invention, as recited in Claims 59 and 86, includes a plurality of surveillance cameras that communicate with a *centralized* control site via a private network. The centralized control site includes a server that communicates with the surveillance cameras. The server also communicates with at least one client workstation via a public network. Serving as a communication layer, the server facilitates a number of video surveillance processes, namely, (1) the initialization of communications between the client workstations and the surveillance

cameras, (2) the retrieval of live video images from the surveillance cameras, and (3) the control of the surveillance cameras by the client workstations. Further, the client workstations are limited in that they cannot initialize communication with the surveillance cameras.

Applicants assert that Barraclough does not teach a centralized control site that includes a server that performs the video processes identified above and recited in Claims 59 and 86. In contrast to the claims of the present invention, Barraclough is limited to teaching direct communication between the supervisory site and the remote site to enable actual communication with the camera located at the supervisory site. Additionally, initialized by the remote site, Barraclough is limited to providing live images to remote sites only via a direct connection (two-layer system architecture) between the supervisory site and the remote site. The three-layer system architecture described in Barraclough does not teach or suggest that the remote site (subscription based video processing unit) can effect actual communication with the supervisory site. Additionally, the three-layer system in Barraclough only describes the transmission of stored images to a remote site. There is no discussion of providing a remote site with live images or providing actual communication between the remote site supervisory site via the server.

In particular, Barraclough fails to teach a centralized control site that includes a server operative to "produce said retrieved video images as live images to at least one off-site client workstation" as recited in Claims 59 and 86. As described above, in accordance with the teachings of Barraclough, in the three-layer system architecture images provided to a remote site are images that are played back from storage. Barraclough only describes providing live images to the remote sites when the remote site is directly connected to the supervisory site (*i.e.*, there is no centralized control site). Accordingly, the transmittal of live images is not processed through a centralized control site that includes at least one server.

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In still a further aspect, Barraclough fails to teach or suggest a centralized control site that includes a server operative "to enable off-site client workstations to effect communication with selected surveillance cameras." Similar to the retrieval of video images, Barraclough only describes the ability to communicate with cameras at a supervisory site via a direct connection between a remote site and a supervisory site. Accordingly, the transmittal of control instructions is not processed through a centralized control site.

For these reasons, applicants respectfully assert that new Claims 59 and 86 are allowable over Barraclough.

B. Claims 60-74 and 87-101.

Dependent Claims 60-74 and 87-101 depend from Claims 59 and 86, respectively, and are therefore patentable for at least the reasons recited above. Furthermore, the dependent claims include additional elements that further distinguish them over Barraclough. Accordingly, applicants respectfully request allowance of the claims.

C. Claim 75

In a manner similar to Claims 59 and 86, Claim 75 recites:

A video surveillance and monitoring system, the system comprising:

a plurality of video monitoring devices, each monitoring device generating video monitoring data corresponding to a monitored site, wherein the plurality of video monitoring devices generate live video data and receive control instructions corresponding to a position of the video monitoring device and wherein at least two video monitoring devices of the plurality of video monitoring devices correspond to distinct monitored sites;

a centralized control site in communication with the plurality of video monitoring devices via a private communication, wherein the centralized control site retrieves live video data from the plurality of video monitoring devices; and

at least one client workstation remote from the plurality of video monitoring devices and in communication with the centralized control site via public communication network, wherein the client workstation requests monitoring device data from at least one monitored site and wherein the client workstation initiates video monitoring communications;

wherein the centralized control site associates at least one of the plurality of video monitoring devices to the client workstation requests and initializes communications between the at least one client workstation and the associated video monitoring device, wherein the client workstation cannot directly access the associated video monitoring device without an initialization by the centralized control site.

As discussed above with regard to Claims 59 and 86, applicants respectfully suggest that Barraclough fails to teach or suggest a centralized control site having the functionality recited in Claim 75. In contrast, Barraclough is limited to teaching a two-layer system architecture in which monitoring terminals directly communicate with surveillance cameras. The three-layer system architecture described in Barraclough does not enable communication between the cameras at the supervisory site and the remote site, nor does it provide remote sites with live images. Accordingly, for these reasons and the reasons recited above, applicants respectfully request allowance of Claim 75.

D. Claims 76-85.

Dependent Claims 76-85 depend from Claim 75 and are therefore also believed patentable for at least the reasons recited above. Furthermore, the dependent claims include additional elements that further distinguish them over the art cited. Accordingly, applicants respectfully request allowance of Claims 75-86.

CONCLUSION

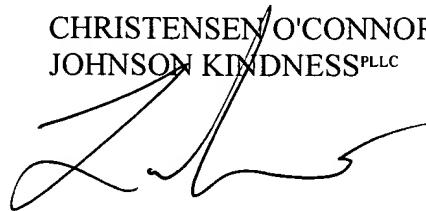
In light of the foregoing amendments and remarks, applicants submit that all the claims of the present application, Claims 59-101, are in condition for allowance. Applicants

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respectfully request entry of the amendments and allowance of all claims. The Examiner is invited to telephone the undersigned attorney if there are any remaining issues.

Respectfully submitted,

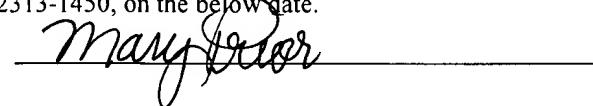
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Date: March 16, 2005



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